

2014 Annual CPNI Certification

Page 1 of 2 Pages

Annual 47 C.F.R. § 64.2009(e) CPNI Certification**EB Docket 06-36**

2014 Annual 64.2009(e) CPNI Certification covering the prior calendar year 2013

Name of company covered by this certification: Leflore Communications, Inc.

Form 499 Filer ID: 815474

Name of signatory: Mike O'Dell

Title of signatory: President

I, Mike O'Dell, certify that I am an officer of the company named above (the "Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that, to the best of my knowledge, information and belief, are adequate to ensure compliance with the Commission's CPNI rules as I understand them. *See* 47 C.F.R. § 64.2001 *et seq.* The basis for my certification is summarized below:

The paging service provided by the Company is billed to the customer monthly on a flat-rate basis. As a result, the Company collects at most only minimal information that could be considered CPNI under the FCC's rules. Any use or disclosure of or provision of access to customer-specific information by the Company, whether CPNI or not, requires approval by the Company's General Manager.

The Company uses, discloses or provides access to CPNI only for the purpose of initiating, rendering, billing or collecting for the paging service provided by the Company. There is only one circumstance under which a third party vendor potentially could access CPNI as an incident of the Company providing its paging service, i.e., the vendor that provides the customer billing software and system to the Company. This vendor does have remote access for diagnostic purposes to the computer housing the Company's billing records, but the Company requires this third party vendor to observe the Company's CPNI obligations and to limit its use of CPNI, if any, solely to the purpose for which it is permitted access. The Company also discloses CPNI to law enforcement personnel in compliance with subpoenas.

Except as described in the preceding paragraph, the Company does not disclose or provide access to CPNI to any third parties for any purpose.

The Company does not employ any third parties to market paging service on its behalf. To the extent any marketing of the Company's paging service is done, it is done through direct solicitations by the General Manager of the Company


The Company has reviewed its CPNI policies and practices so as to be in compliance with the CPNI rule changes adopted by the FCC in 2007.

The Company did not take any actions (*i.e.*, institute proceedings or file petitions at either state commissions, the court system, or at the FCC) against data brokers during 2013.

The Company did not have any incidents of "pretexting" during 2013.

The Company did not receive any customer complaints during 2013 concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the FCC. The Company also acknowledges that false statements and misrepresentations to the FCC are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Mike O'Dell
Date: 2-21-2014